

Kyle R. Knapp, SBN 166597
Attorney at Law
916 2nd Street
2nd Floor
Sacramento, CA 916814
916-441-4717
Fax:916-441-4299
kyleknapp@sbcglobal.net

Attorney for Defendant
Cody. Cramer

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,) Case No. 2:21-cr-00155-JAM
Plaintiff,)
vs.) STIPULATION AND ORDER TO CONTINUE
) STATUS CONFERENCE AND EXCLUDE TIME
JOSHUA WILSON and) Date: November 12, 2024
CODY CRAMER,) Time: 9:00 a.m.
Defendants.) Judge: Hon. John A. Mendez

IT IS HEREBY STIPULATED and agreed by and between United States Attorney Phillip A. Talbert, through Assistant United States Attorney James R. Conolly, counsel for Plaintiff; Federal Defender Heather Williams, through Assistant Federal Defender Hootan Baigmohammadi, counsel for Defendant Joshua Wilson; and Kyle Knapp, counsel for Cody Cramer that the status hearing currently set for November 12, 2024, at 9:00 be continued to January 28, 2025, at 9:00 a.m.

The parties specifically stipulate as follows:

1. By previous order, this matter was set for a status on November 12, 2024, at 9:00 a.m.
2. By stipulation, Mr. Cramer now moves to continue the status conference to **January 28, 2025, at 9:00 a.m.**

3. To date, the government has produced approximately 850 pages and various audio/video recordings of discovery to the defendants.
4. Mr. Wilson and Mr. Cramer require additional time to review the discovery, investigate and research possible defenses, research potential pretrial motions, and explore potential resolutions to the case, and otherwise prepare for trial.
5. Mr. Wilson and Mr. Cramer believe that failure to grant the requested continuance would deny them the reasonable time necessary for effective preparation, taking into account the exercise of due diligence.
6. Neither the government nor Mr. Wilson object to the continuance.
7. For the purpose of computing time under 18 U.S.C. § 3161 *et seq.* (Speedy Trial Act), the parties request that the time period between November 12, 2024 and January 28, 2025, inclusive, be deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(B)(iv) (Local Code T4), because it would result from a continuance granted by the Court at the defense's request, based on a finding that the ends of justice served by granting the continuance outweighs the best interest of the public, Mr. Wilson, and Mr. Cramer in a speedy trial.

Respectfully submitted,

HEATHER E. WILLIAMS
Federal Defender

Date: November 4, 2024

/s/ Hootan Baigmohammadi
HOOTAN BAIGMOHAMMADI
Assistant Federal Defender
Attorneys for Mr. Wilson

Date: November 4, 2024

/s/ Kyle Knapp
Kyle Knapp
Attorney for Mr. Cramer

Date: November 4, 2024

PHILLIP A. TALBERT
United States Attorney

/s/ James R. Conolly
James R. Conolly
Assistant United States Attorney
Attorneys for Plaintiff

ORDER

The Court, having received and considered the parties' stipulation, and good cause appearing therefrom, **ADOPTS** the parties' stipulation in its entirety as its order.

IT IS SO ORDERED.

Dated: November 06, 2024

/s/ John A. Mendez

THE HONORABLE JOHN A. MENDEZ
SENIOR UNITED STATES DISTRICT JUDGE